

NPDES Inspection Report – Industrial User

Name of industry and location:	Control authority / Permit No. / Facility ID:	
B&B Blending, LLC 10963 Leroy Drive Northglenn, Colorado 80233	City of Northglenn Permit No. 10963 Leroy Drive-001-2021 NPDES ID: COPU00142 Inspection ID: 202103_COPU00142 SIC Codes: 2841 and 2842 Latitude: 39.89499°N, Longitude: -104.96364°W	
Date of remote inspection:	Time of remote inspection:	
March 29, 2021	10:00 am – 12:30 pm; 3:00 pm – 3:30 pm	
Name(s) / Affiliation of inspector(s):		
Kristin Ratajczak / Physical Scientist / U.S. Environmental Protection Agency, Region 8 (lead) Stephanie Meyers / Life Scientist / U.S. Environmental Protection Agency, Region 8 Tami Moon / Environmental Manager / City of Northglenn		
Name / Title / Affiliation:		
Bob Blahnik / President, General Manager / B&B Blending, LLC Beth Tirrell / Senior Technical Specialist, Chemist / B&B Blending, LLC Chris Gallahar / Chief Technical Officer, Chemist / B&B Blending, LLC Matt Meyer / Supply Manager / B&B Blending, LLC		
Report Review and Signature		
Drafter Name	Address/Phone Number	Date
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Inspection Description:

On Monday, March 29, 2021, U.S. Environmental Protection Agency (EPA) inspectors Kristin Ratajczak and Stephanie Meyers (jointly referred to as inspectors) and City of Northglenn (City) inspector Tami Moon conducted an industrial user inspection of B&B Blending, LLC (B&B or facility) as part of a pretreatment compliance inspection (PCI) of the City. The City had identified B&B as a Significant Industrial User (SIU), permitted to discharge to the City's sanitary sewer system under Permit No. 10963 Leroy Drive-001-2021 (permit). The inspection was announced to B&B approximately one week prior to the inspection to accommodate planning considerations. Due to the COVID-19 pandemic, this inspection was conducted remotely, via the Microsoft Teams platform with B&B representatives uploading photographs, video, and floor plans of the facility to OneDrive.

Upon beginning the opening conference at approximately 10:00 am, inspectors introduced themselves to B&B representatives Bob Blahnik, General Manager and President; Beth Tirrell, Senior Technical Specialist and Chemist; Chris Gallahar, Chief Technical Officer and Chemist; and Matt Meyer, Supply Manager. The inspectors explained the general purpose and procedures of the inspection. To document and record conversation details and inspection observations, inspectors used bound or electronic checklists with questions applicable to permitted industrial users. During the opening conference, Mr. Blahnik, Ms. Tirrell, Mr. Gallahar, and Mr. Meyer provided an overview of the operations at the facility and the pretreatment system.

As a component of the opening conference, inspectors reviewed photos with B&B representatives, to understand the context and location of each photo. The photos focused on the facility processes generating wastewater, chemical and waste storage, packaging, and the pretreatment system; however, because the inspection was conducted remotely, inspectors were unable to independently observe current conditions at the facility. Inspectors conducted a closing conference at approximately 3:00 pm, during which general observations and preliminary findings from the inspection were explained to the facility. The remote inspection concluded at approximately 3:30 pm. On April 12, 2021, Ms. Ratajczak sent an email to Mr. Blahnik, Ms. Tirrell, Mr. Gallahar, and Mr. Meyer transmitting preliminary findings from the B&B industrial user inspection.

1. What does this industry produce?

B&B is a chemical manufacturer, blending polishes, waxes, degreasers, soaps, and detergents for use in car wash, janitorial, and industrial cleaning applications, and is able to produce 1282 unique formulations. Process wastewater generated from vessel rinsing operations, floor scrubbers, and utility sinks is routed through an onsite wastewater treatment system and discharged to the City's sanitary sewer. The facility is comprised of three blending occupancies, chemical receiving and shipping, packaging, an onsite laboratory, and administrative offices. B&B has approximately 60 employees and operates Monday through Friday from 7:00 am to 5:00 pm.

2. How is the industry classified by the POTW?

The City classified B&B as a Significant Industrial User (SIU), due to the facility's reasonable potential for adversely affecting the POTW's operations. The facility discharged wastes incompatible with the City's POTW operations on four occasions since 2019; on September 5, 6, and 17, 2019, the facility discharged residual material containing high concentrations of blue dye that could not be removed by the City's treatment process, resulting in the POTW discharging blue effluent to Big Dry Creek. Additionally, on February 23, 2021, the facility released a 1400-gallon slug discharge of off-spec soap to the City's POTW,

resulting in foaming at one of the City's lift stations that persisted for three days.

While the site history supports the conclusion that B&B presents reasonable potential to adversely affect the POTW's operations, the facility also appears to be a categorical industrial user (CIU) subject to 40 CFR §417.166 – Manufacture of Liquid Detergents Pretreatment Standards for New Sources. This subpart is applicable to operations including blending and packaging of liquid detergents and includes blending of previously manufactured intermediates. Manufacture of specialty cleaners are excepted from the regulation.

In addition to products exempt from the regulation such as specialty cleaners and polishes, B&B manufactures soaps and detergents, via blending of previously manufactured intermediates, as described in Sections 1 and 5 of this report.

3. Have there been any significant changes in processes or flow?

Production at B&B varies seasonally, with heightened demand occurring between February and October annually. During peak demand in 2020, wastewater generation varied between 2,167 to 4,739 gpd. During the inspection, facility representatives indicated B&B had not experienced significant changes in processes or flow; upon review of the facility's wastewater generation records, inspectors observed the facility's average wastewater increased by 17% overall from 2019 to 2020.

4. What raw materials are used?

The facility uses 482 raw chemicals and intermediates to formulate products. A list of these raw chemicals was provided to inspectors during the inspection and is included with this report as Attachment A.

5. What processes are used to make the product(s)? Indicate any wastes generated and the destination of wastes.

The facility blends the chemicals listed in Attachment A in three separate occupancies to formulate final products including polishes, waxes, automotive paints, degreasers, soaps, acid detergents, and non-hazardous detergents. Packaging occurs in a fourth occupancy onsite.

H2 Occupancy

B&B formulates polishes, waxes, and automotive paints in the H2 occupancy. Forklifts and rolling scales are used to transport raw chemicals for use. Drummed raw materials are weighed prior to being added, either manually or via pump, to portable vessels. Ingredients are mixed and water is hard piped to the vessel for blending. The H2 occupancy houses six vessels, varying in capacity from 55-500 gallons. Final formulations are packaged using portable pumps. Approximately six to ten blends are formulated in the H2 occupancy per day.

Following packaging, residual material is squeegeed to the bottom of the vessel and rinsed with water. Degreaser is added to the vessel prior to a final rinse. Water used to rinse vessels varies depending on the vessel size and formulation, from about 5 to 40 gallons. Wastewater is discharged from the vessels to a trench drain (photo 1372), where wastewater is held until a gate valve is opened manually to allow it to flow to the central wastewater sump.

H3 Occupancy

B&B formulates degreasers and soaps in the H3 occupancy. Similar to the H2 occupancy, forklifts and

rolling scales are used to transport raw chemicals for use. Drummed raw materials are weighed prior to being added, either manually or via pump, to portable vessels. Ingredients are mixed and water is hard piped to the vessel for blending. The H3 occupancy houses 10 vessels varying in capacity from 55 to 1000 gallons. Final formulations are packaged using portable pumps. Approximately 16 to 20 blends are formulated in the H3 occupancy per day.

Following packaging, residual material is squeegeed to the bottom of the vessel and rinsed with water. Because degreasers are formulated in this occupancy, additional degreaser is not needed to clean vessels. Water used to rinse vessels varies depending on the vessel size and formulation, from about 5 to 55 gallons. Wastewater is discharged from the vessels to one of two floor drains (photos 1365 and 1366), one of which is not equipped with a valve to hold wastewater in place prior to discharge to the central wastewater sump.

H4 Occupancy

B&B formulates acid detergents and non-hazardous detergents in the H4 occupancy. Similar to the other two occupancies, forklifts and rolling scales are used to transport raw chemicals for use. Drummed raw materials are weighed prior to being added, either manually or via pump, to portable vessels. Ingredients are mixed and water is hard piped to the vessel for blending. The H4 occupancy houses two vessels with 1000-gallon capacity. Final formulations are packaged using portable pumps.

Following packaging, residual material is squeegeed to the bottom of the vessel and soda ash is added to the vessel to neutralize the pH. Vessel contents are rinsed with approximately 30 to 50 gallons of water. Wastewater is discharged from the vessels to a floor drain in the occupancy (photo 1381), where wastewater is held until a gate valve is opened manually to allow it to flow to the central wastewater sump.

F1 Occupancy

Following formulation in the previously described occupancies, final products are packaged in bulk containers for shipping in the F1 occupancy. Floor drains and a trench drain are present in the occupancy and are not equipped with gate valves to prevent spills from entering the central wastewater sump. Because vessels are rinsed in the H2, H3, and H4 occupancies, no process wastewater should be generated in the F1 occupancy.

Domestic sewage generated onsite is discharged separately from process wastewater, comingling downstream from the monitoring point.

6. Where is water used and what is the source of the water (city, well, river, etc.)?

The facility uses City water in its operations. From 2019 to 2020, the facility used approximately 182,000 gallons of water per month on average.

7. Describe the processes which discharge wastewater.

Refer to Sections 5 and 9 of this report for a description of the processes that discharge process wastewater.

In addition, there are several other sources of wastewater generated from the occupancies. The facility uses floor scrubbers to clean the occupancies and wastewater from this process flows to the nearest trench or floor drain prior to discharging to the central wastewater sump. Also, the occupancies contain utility sinks for rinsing small equipment and vessels such as buckets. Discharge from the sinks is plumbed to the central wastewater sump.

8. Describe the sample location. Are the Control Authority and industry using the same location?

The facility monitors all regulated parameters at Outfall 01, located in the monitoring manhole immediately downstream of the sand/oil separator, with the exception of flow; the facility monitors the final flow prior to discharge to the sand/oil separator.

For the City's compliance monitoring at B&B, samples are collected from Outfall 01.

9. Describe the treatment system in place.

As described in Section 5, process wastewater generated in the H2, H3, and H4 occupancies flows to the central wastewater sump. The sump is equipped with a float and wastewater is pumped automatically to the wastewater treatment system (photo 1368).

Process wastewater flows to two totes in series that provide detention time for solids separation. Solids collected in these totes are pumped out monthly for offsite disposal. Following settling in the totes, wastewater flows by gravity to a coalescing tank for additional settling and equalization. Effluent from the coalescing tank discharges to a pH neutralization tank. The pH meter in this tank has set points of 10 SU and 6 SU, past which phosphoric acid or sodium hydroxide is added, respectively. pH adjustment chemicals are stored in 15-gallon drums on secondary containment (photo 1369) and facility representatives estimated the chemicals are consumed every six weeks. Facility representatives estimated the coalescing tank and pH neutralization tank are cleaned out once or twice per year. Wastewater continuously cycles through the pH neutralization tank, discharging to a media filtration unit, which is designed to remove hydrocarbons and silicone material. The filter media requires maintenance, which is initiated when employees become aware that wastewater is passing through the filter slowly. Wastewater passes through a final flow meter before flowing to an exterior sand/oil separator for final treatment and discharging from Outfall 01 to the City's sewer system. As required by the facility's industrial discharge permit, the sand/oil separator is pumped out monthly for offsite disposal.

During the facility's operating hours, process wastewater discharge is continuous.

10. What chemicals are maintained at the facility? How are they stored? Is adequate spill prevention in place?

As described in Section 4, the facility stores 482 raw chemicals onsite; the occupancy in which each chemical is stored depends on the formulations the raw material is used to blend. Raw chemicals throughout the facility are stored without secondary containment or berms (photos 1358, 1359, 1360, 1361, 1364, 1370, 1372, 1373, 1376, 1377, 1378, 1379, 1380, 1382, and 1385).

As a component of the City's enforcement response to the February 2021 slug discharge, the facility was required to revise the slug discharge control plan (SDCP), which was in draft form at the time of the inspection. The plan was missing the following components: description of stored chemicals; procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under 40 CFR §403.5(b) with procedures for follow-up written notification within five days; and if necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of

plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

11. Are any hazardous wastes discharged?

The facility indicated that no characteristic hazardous waste is discharged to the City.

FINDINGS AND CORRECTIVE ACTIONS

The following findings were identified during the inspection. The EPA requested the City work directly with B&B to oversee correction of these deficiencies. No response from B&B to the EPA is requested at this time.

Finding 1 – The facility’s SDCP did not meet the requirements in 40 CFR §403.8(f)(2)(vi).

As a component of the City’s enforcement response to the slug discharge that occurred on February 23, 2021, the facility was required to revise the SDCP, which was in draft form at the time of the inspection. The plan was missing the following components: a description of stored chemicals; procedures for immediately notifying the POTW of slug discharges, including accurate contact information; and procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, and worker training. Additionally, the draft SDCP proposed that facility representatives would seek approval from the City for sewer disposal for off-spec products, rather than arrange off-site disposal; however, the facility’s industrial discharge permit prohibits slug discharges categorically.

Pretreatment Requirements

According to the requirements of 40 CFR §403.8(f)(2)(vi), the POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to, “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW’s regulations, local limits or Permit conditions. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.”

Corrective Actions

Update the SDCP to include all requirements of 40 CFR §403.8(f)(2)(vi) and remove inclusions proposing to seek approval for discharge of off-spec products. Provide the City with a copy of the updated SDCP and a description of how this corrective action was accomplished.

Finding 2 – Raw chemicals and finished product were stored without secondary containment.

Throughout the facility, raw chemicals were stored without secondary containment or berms in close proximity to floor drains, as shown in photos 1358, 1359, 1360, 1364, 1370, 1372, 1373, 1376, 1377, 1378, 1379, and 1380. With the exception of one drain in the H3 occupancy, floor drains in the H2, H3, and H4 occupancies were equipped with gate valves that default to a closed position, that are opened regularly at timed intervals to allow wastewater to flow to the central wastewater sump. However, the SDCP did not specify procedures that employees should observe in order to identify slug discharges and prevent slugs from flowing to the central wastewater sump.

In addition, floor drains in the F1 occupancy were unprotected and finished product was stored nearby without secondary containment (photos 1380, 1382, 1385, and 1387). In the event of a spill, finished product would flow directly to the onsite wastewater treatment system, presenting significant slug discharge potential. The drains in the F1 occupancy are not needed for blending operations.

Pretreatment Requirements

According to the requirements of 40 CFR §403.8(f)(2)(vi), the POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to, “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.”

Corrective Actions

Add secondary containment, berms, or other spill prevention engineering controls in occupancies storing raw chemicals. In the F1 occupancy, add secondary containment or permanently close the floor drains to nullify

potential for spilled final product to flow to the central wastewater sump. Provide photos of the corrective actions to the City. Update the SDCP to include details for identification of potential slug discharges and procedures for ensuring slug discharges do not enter the central wastewater sump. Provide the City with a description of how these corrective actions were accomplished.

Finding 3 – The facility experienced an unanticipated bypass in October 2019 that did not meet criteria for an allowable bypass in 40 CFR §417.

Due to a broken pipe and valve malfunction, an unanticipated bypass occurred at the facility on October 24, 2019. The facility provided notification to the City via email on October 25, 2019; however, this notification did not adhere to the requirements to notify the control authority orally in 40 CFR §417(c); also, a written submission was not submitted five days later as required. Additionally, based on information provided by the facility during the inspection, the bypass was not unavoidable to prevent loss of life, personal injury, or severe property damage, as required for an allowable bypass in 40 CFR §417(d)(1).

Pretreatment Requirements

40 CFR §403.17(c)(2) requires that, “An Industrial User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within 24 hours from the time the Industrial User becomes aware of the bypass. A written submission shall also be provided within 5 days of the time the Industrial User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.”

40 CFR §403.17(d)(1) stipulates that bypass is prohibited unless the following criteria are met:

- “(i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (ii) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
- (iii) The Industrial User submitted notices as required under paragraph (c) of this section.”

Recommendations

Submit required notifications for all future instances of bypass and take actions to prevent bypass of the onsite wastewater treatment system. Provide the City with a description of how the facility will ensure regulatory requirements are met in the future.

Finding 4 – The facility was not monitoring flow at the regulated outfall.

Part 1.A of the permit identifies that the regulated outfall as located at the monitoring manhole immediately downstream of the sand/oil separator and requires monitoring to occur at that location. During the inspection, facility representatives described sampling procedures for compliance with the permit, indicating that the final flow measurement was taken following polishing and prior to discharge to the sand/oil separator. The sand/oil separator provides the final step of wastewater treatment prior to entering the City’s sewer system. Flow

measurements taken prior to discharge from the sand/oil separator were not representative of the flow rate discharged to the sewer system.

Pretreatment Requirements

40 CFR §403.8(f)(1)(iii)(B)(4) requires that control mechanisms establish, “self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with §403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law.”

40 CFR §403.12(g)(3) requires data reported by industrial users to be representative of conditions occurring during the reporting period.

Corrective Actions

Collect samples and measurements in compliance with the industrial discharge permit, that are representative of the facility’s discharge. Provide the City with a description of how this corrective action was accomplished.

Finding 5– The facility was not collecting the correct sample type for compliance.

To conduct sampling for compliance with the permit, B&B indicated the standard practice was to collect aliquots every hour to create a time-proportioned composite. Part I.D. of the permit requires the facility to collect flow-proportioned composite samples to ensure the sample is representative of discharge.

Pretreatment Requirements

40 CFR §403.8(f)(1)(iii)(B)(4) requires that control mechanisms establish, “self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law.”

40 CFR §403.12(g)(3) requires reports, “be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period. The Control Authority shall require that frequency of monitoring necessary to assess and assure compliance by Industrial Users with applicable Pretreatment Standards and Requirements. Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities. Using protocols (including appropriate preservation) specified in 40 CFR part 136 and appropriate EPA guidance,

multiple grab samples collected during a 24-hour period may be composited prior to the analysis as follows: For cyanide, total phenols, and sulfides the samples may be composited in the laboratory or in the field; for volatile organics and oil & grease the samples may be composited in the laboratory. Composite samples for other parameters unaffected by the compositing procedures as documented in approved EPA methodologies may be authorized by the Control Authority, as appropriate.”

Corrective Actions

Collect samples and measurements in compliance with the industrial discharge permit, that are representative of the facility’s discharge. Provide the City with a description of how this corrective action was accomplished.

Finding 6 – Flow monitoring records were not being reliably reviewed within the timeframe required by the permit.

During the inspection, B&B representatives indicated that flow monitoring records were reviewed, at a minimum, semiannually, in preparation for reporting self-monitoring data to the City. Part 1.D of the permit requires the facility to review flow records daily, in order to report excursions within 24 hours.

Pretreatment Requirements

40 CFR §403.12(g)(2) requires industrial users to notify the control authority within 24 hours of becoming aware of a violation.

Corrective Actions

Review flow measurements daily and report observed excursions within 24 hours, in compliance with the permit. Provide the City with a description of how this corrective action was accomplished.

Finding 7 – Chemical waste was being stored outside without stormwater protections.

Facility representatives indicated they were coordinating with a waste hauler to ship chemical waste offsite for disposal. At the time of the inspection, totes of chemical waste had been stored outside for approximately 60 days in preparation for pickup, without cover or secondary containment (photo 1388).

Recommendations

The EPA recommends stormwater controls, such as covers, constructed of storm-resistant material, and secondary containment be installed if the facility elects to continue storing chemical waste outdoors. Provide the City with photos of the corrective actions taken and a description of how this recommendation was accomplished.

Finding 8 – Stormwater protection controls in the facility’s parking lot were not being tested.

Page 3 of the facility’s SDCP indicated that, in the event of an overflow of fire suppression material, the parking lot was designed for use as an emergency retention pond, and equipped with an automated gate valve to ensure stormwater protection; however, the gate valves had not been tested to the facility representatives’ recollection. However, the SDCP references additional facility plans, including a plan titled, “Inspection of Storage Areas.” Page 1 of this plan indicates that facility representatives regularly check the stormwater protection gate valve.

Recommendations

The EPA recommends the gate valve in the parking lot stormwater outfall be tested to ensure it is in working

order. Ensure facility plans are maintained and represent current practices and update plans as needed. Provide the City with a description of how these recommendations were accomplished.
